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*Attorneys for Defendant Sonos, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

GOOGLE LLC,  
Plaintiff,

v.

SONOS, INC.,  
Defendant.

Case No. 3:20-cv-06754-WHA

**DECLARATION OF GEOFFREY MOSS  
IN SUPPORT OF SONOS, INC.'S  
MOTION FOR LEAVE TO AMEND  
INFRINGEMENT CONTENTIONS  
PURSUANT TO PATENT L.R. 3-6**

Date: March 24, 2022  
Time: 8:00 a.m.  
Place: Courtroom 12, 19<sup>th</sup> Floor  
Judge: Hon. William Alsup

Complaint Filed: September 28, 2020

1 I, Geoffrey Moss, declare as follows and would so testify under oath if called upon to do  
2 so:

3 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel  
4 of record to Sonos, Inc. ("Sonos") in the above-captioned matter. I am a member in good standing  
5 of the Bar of the State of California. I make this declaration based on my personal knowledge,  
6 unless otherwise noted. If called, I can and will testify competently to the matters set forth herein.

7 2. I make this declaration in support of Sonos's Motion for Leave to Amend its  
8 Infringement Contentions Pursuant to Patent L.R. 3-6.

9 3. On January 10, 2022, pursuant to Patent Local Rule 4-2, the parties exchanged  
10 their proposed constructions for claim terms identified by the parties in their Patent Local Rule 4-  
11 1 exchange. In its Patent Local Rule 4-2 disclosure, Google set forth its proposed constructions of  
12 "resource locators" and "local playback queue on the particular playback device" found in the  
13 asserted claims of the '615 Patent.

14 4. Thereafter, I participated in a review of the source code of the accused Google  
15 products on the following dates: January 12, January 13, January 14, January 18, January 19,  
16 January 31, February 1, February 2, February 3, February 4, and February 7.

17 5. Attached as **Exhibit 1** is a true and correct copy of Sonos's proposed Amended  
18 Infringement Contentions with redlines to reflect Sonos's proposed changes.

19 6. Attached as **Exhibit 2** is a true and correct copy of a February 4, 2022, email  
20 communication from Cole Richter, counsel for Sonos, to Nima Hefazi, counsel for Google.

21 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
22 knowledge. Executed this 7th day of February, 2022 in Los Angeles, California.

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26 GEOFFREY MOSS